

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER REDFORD  
COMMISSIONER SMITH  
COMMISSION SECRETARY  
LEGAL  
WORKING FILE

**FROM:** CAROLEE HALL

**DATE:** JUNE 11, 2013

**RE:** TC SYSTEMS, INC. ("TCS") PETITION FOR A SAFETY VALVE  
WAIVER OF FCC THRESHOLD REQUIREMENTS FOR NUMBERING  
RESOURCES IN IDAHO'S BOISE MAIN RATE CENTER; CASE NO.  
TCS-T-13-01.

### BACKGROUND

On May 22, 2013, the Commission received a Petition for a Safety valve waiver of numbering resource guidelines from TC Systems, Inc. ("TCS"). The Safety Valve was filed following Neustar's denial of the Company's Application for additional numbering resources in the Boise main rate center. In this Petition, TCS indicated that on May 10, 2013, it had requested an additional three one-thousands blocks of numbers in the Boise main rate center. The Company filed its request with Neustar on behalf of a customer in the Boise area.

TC System's Neustar Application was denied due to the "Months To Exhaust" (MTE) calculation for the rate center. According to the report, the MTE for the Boise rate center exceeds the FCC guidelines.<sup>1</sup> Moreover, TCS's customer requested a specific sequential thousands-block of 208-333, 3, 4, and 5, which are currently reserved pending the approval of this Safety Valve request.

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<sup>1</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, Section 52.15 (g)(3)(iii)).

## **STAFF ANALYSIS**

Staff has reviewed the request for the Safety Valve waiver of the “months to exhaust” threshold requirements and believes it is reasonable for the customer’s business plan.

## **RECOMMENDATION**

Staff recommends that the waiver request for the three sequential one-thousand blocks of numbers be granted to TCS for its customer. Specifically, Staff recommends that the reserved NPA NXX X (208-333-3, 4 and 5) be released to TCS for its Boise rate center customer.

## **COMMISSION DECISION**

Does the Commission agree?



Carolee Hall

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